## REMARKS

In the Office Action, claims 1-22 were rejected. Reconsideration and allowance of all pending claims are requested.

### Rejections Under 35 U.S.C. § 103

Claims 1-22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication 2004/0215664 A1 (hereinafter "Hennings") in view of U.S. Patent Publication 2002/0032677 A1 (hereinafter "Morgenthaler").

Claims 1, 8, 15 and 22 are independent. All of the recited claims are believed to be patentable as cited below.

### Claim 1 and the Claims Depending Therefrom.

The Examiner argued that Hennings is believed to teach adding an HTML keyword to the HTML document, wherein the HTML keyword represents a respective one of the plurality of categories of information. The Examiner cited passages at paragraphs 90 and 91 and FIGs. 7-9 of Hennings in support of the rejection.

A portion of the cited passage at paragraph 90 reads:

> Another feature of the present invention is the ability to associate category information with design components in web page documents. This feature enables a web page author to insert a category list component in a design page. The category list component is used to automatically generate hyperlinks to various documents based on categorical information pertaining to the hyperlinks.

The cited passages from Hennings do not support the Examiner's position, however. Applicants respectfully submit that Hennings teaches a method for generating hyperlinks in a referring document to documents that are stored on a server, each of the documents having a server address. In particular, as can be seen from FIG. 9A of

Hennings, a user can create web pages in a WYSIWYG environment by inserting various components such as graphics text. In addition, the user can also insert category list components *directly* in the design page. Furthermore, the category list components are used to automatically generate a list of one or more hyperlinks to documents on a web that are assigned a category matching the category associated with each category list component.

Thus, Hennings teaches adding a category list component *directly* in the design page. On the contrary, the pending claims relate to creating a HTML document representative of at least one category group or sub-group, where the HTML group can be searched using a search engine. In addition, one or more keywords representative of the category may be placed in the HTML header of the newly created HTML document. After careful review, Applicants reiterate that Hennings does not teach adding an *HTML keyword* to the *HTML document* where the HTML keyword represents a respective one of the plurality of categories of information.

The Examiner further argued that Hennings is believed to teach uploading the HTML document on the web site. Further, the Examiner cited passages at paragraphs 42 and 79 of Hennings in support of the rejection.

A portion of the cited passage at paragraph 42 reads:

> When an author edits and saves the linked document, one
> or more of the meta-data entries associated with the linked
> document are *updated*, so that the contextual information
> for the display page can be determined. (Emphasis added.)

The cited passage from Hennings does not support the Examiner's position, however. Applicants respectfully submit that Hennings teaches a method for promoting contextual information associated with a linked document to a display page that contains a hyperlink to the linked document.

A portion of the cited passage at paragraph 79 reads:

> The HTML content of "index.htm" document 131 can then
> be *updated* at render time (i.e., at the time the client
> requests the document from the web server and the web
> server uploads the document to the client for rendering) by
> the browser 410. (Emphasis added.)

This passage similarly does not support the Examiner's position. After careful review of Hennings, Applicants respectfully submit that Hennings teaches two schemes for promoting data to a referring document: a "save time" scheme and a "render time" scheme, where both the schemes are performed on the web server side of the client-server environment. In addition, the cited passage does not teach uploading the HTML document that contains a *HTML keyword* representative of one of the plurality of categories of information to a directory on the web site.

Hennings teaches a method for promoting contextual information associated with a linked document to a display page that contains a hyperlink to the linked document and two schemes for promoting data to a referring document. On the contrary, the present claims recite uploading the newly created HTML document to a directory in the web site, where the directory is associated with the category of information selected. Uploading the HTML document to the associated directory on the web site greatly facilitates the search engine to identify the new HTML document. After careful review, Applicants reiterate that Hennings does not teach uploading *a HTML document* to a *directory* on the web site.

Additionally, the Examiner argued that Hennings is believed to teach creating an up-to-date web page for the respective one of the plurality of categories of information from the search result wherein the up-to-date web page includes the link to the HTML

documents containing the HTML keyword. The Examiner cited passages at paragraphs 7 and 33 in support of the rejection.

A portion of the cited passage at paragraph 7 reads:

> HTML documents are generally static, that is, their contents do not change over time unless modified by a service developer or by the author.

Here again, the cited passage does not support the Examiner's position, however. Applicants respectfully submit that the cited passage teaches that a user may modify the generally static HTML documents.

In addition, the cited passage at paragraph 33 does not support the Examiner's position. Rather, the cited passage simply teaches the functioning of the Web server and Web browser communication using the Hypertext Transfer Protocol (HTTP).

Thus, Hennings describes communication between the Web server and the Web browser employing the HTTP protocol. On the contrary, the pending claims recite the dynamic creation of a HTML document by the search engine that is returned to the user. In particular, the search engine searches the directory that relates to the category of information to identify HTML documents that relate to the requested category of information. As the search engine identifies the HTML documents, the search engine dynamically creates an HTML document that includes a link to each of the identified HTML documents, and this document is returned to the user. Applicants therefore reiterate that Hennings does not teach creating an up-to-date web page for the respective one of the plurality of categories of information from the search result, where the up-to-date web page includes the link to the HTML documents containing the HTML keyword.

The Examiner acknowledged that Hennings does not explicitly teach activating a search in the directory when the respective one of the plurality of categories of

information is selected, the search containing at least the HTML keyword and calling a search engine to execute the activated search and produce a search result, wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword.

Furthermore, the Examiner argued that Morgenthaler teaches a tree directory where each category is a directory or subdirectory containing the web site or web page and pertinent information. The Examiner cited the passages at paragraphs 9, 101, and 162 and FIGs. 6 and 20 of Morgenthaler in support of the rejection. Additionally, the Examiner argued that Morgenthaler teaches search engines that retrieve web sites and web pages matching the text or topic query or keyword, and displays the results to the Internet user. The Examiner cited the passages at paragraphs 10 and 11 in support of the rejection.

Applicants have carefully reviewed Morgenthaler and respectfully submit that Morgenthaler teaches a streamlined method of searching and pinpointing information available on the Internet. Further, in Morgenthaler, static screen shot images of the web site home pages are captured, converted into compressible files and into different sizes, constructed and categorized into a relational database, and then displayed into various sizes within a slideshow format or business directory format. Hence, Applicants submit that Morgenthaler teaches a searchable graphical database of static homepages and displaying the search resulting in an easily navigable graphical format.

On the contrary, the pending claims recite calling a search engine when a category is selected *without* the use of a *database*. The search engine then searches the directory that relates to the category of information selected. In particular, the search engine searches the directory for HTML documents containing the HTML keyword of the category selected. Thus, Morgenthaler does not teach activating a search in the directory and calling a search engine to execute the activated search as claimed. Additionally,

Morgenthaler does not teach calling a search engine to execute the activated search *without using a database*.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established against independent claim 1, and respectfully request the Examiner to reconsider rejection of the claims.

## Claim 8 and the Claims Depending Therefrom.

The Examiner relied upon Hennings for teaching adding an HTML keyword to the HTML document, wherein the HTML keyword represents the respective one of the plurality of categories of information. Furthermore, the Examiner argued that Hennings teaches uploading the HTML document to the web site. Additionally, the Examiner relied upon Hennings for teaching creating an up-to-date web page for the respective one of the plurality of categories of information from the search result, wherein the up-to-date web page includes the link to the HTML documents containing the HTML keyword.

However, the Examiner acknowledged that Hennings does not explicitly teach activating a search in the directory when the respective one of the plurality of categories of information is selected, the search containing at least the HTML keyword, and calling a search engine to execute the activated search and produce a search result, wherein the search result identifies a link to the HTML document in the directory containing the HTML keyword. The Examiner relied on Morgenthaler for such teachings.

As discussed for claim 1, the Examiner relied upon Hennings and Morgenthaler for teaching a method for adding an HTML document to a web site, the HTML document relating to at least one of a plurality of categories of information. However, in view of the arguments, and for the same reasons, discussed above for claim 1, independent claim 8 and claims depending therefrom are believed to be clearly patentable over the cited references.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established against independent claim 8 and claims depending therefrom, and respectfully request the Examiner to reconsider rejection of the claims.

## Claim 15 and the Claims Depending Therefrom.

The Examiner relied upon Hennings for teaching determining a plurality of searches, wherein each respective one of the plurality of searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine. Further, the Examiner cited passages at paragraphs 93, 94 and 96 of Hennings in support of the rejection.

The cited passages from Hennings do not support the Examiner's position. Applicants respectfully submit that the cited passages describe associating a category with each of the newly created web pages, where the category corresponds to category list components in the design page. Further, the user can also modify the category associated with an existing web page. The category information is stored as a meta-data entry in the contextual information file associated with the new or existing page, and the data promotion engine then parses through all of the documents on the site in search of documents that contain a category list component matching the category of the new document.

In contrast, claim 15 relates to deciding on a plurality of categories of information to be displayed on a website and determining a plurality of searches, where each respective one of the plurality of searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine. Hennings does not teach deciding on a plurality of categories of information to be displayed on a web site. Further, Applicants submit that the cited passages do not teach determining a plurality of searches, where each respective one of the plurality of

searches corresponds to a respective one of the plurality of categories of information, each of the plurality of searches being executed by a search engine.

In addition, the Examiner relied upon Hennings for teaching assigning a keyword for each respective one of the plurality of categories of information. The Examiner cited passages at paragraph 92 and FIGs. 7-9 of Hennings in support of the rejection.

A portion of the cited passage at paragraph 92 reads:

> The category list components are used to automatically generate a list of one or more hyperlinks to documents on a web that are assigned a category matching the category associated with each category list component.

Applicants respectfully submit that the cited passage teaches that one or more *categories* are assigned to each web page on the web site. On the contrary, Applicants submit that claim 15 involves assigning one or more *keywords* to each of the categories, where the one or more keywords are stored in a HTML document.

Furthermore, the Examiner relied upon Hennings to teach creating at least one HTML document to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword, wherein the at least one assigned keyword is included in a HTML header of the at least one HTML document. The Examiner cited passages at paragraphs 29, 30, 90, and 91, and FIGs. 7-9 of Hennings in support of the rejection.

A portion of the cited passage at paragraph 30 reads:

> For example, a gateway might receive queries, look up the answer in a database to provide a response, and translate the response into a page of HTML so that the server can send the response to the client.

The passages cited at paragraphs 29 and 30 teach the fundamentals of a web site, web server and a gateway. Further, the passages cited at paragraphs 90 and 91 merely teach inserting category information directly into a design page.

In contrast, as previously noted with reference to independent claim 1, claim 15 involves creating a new HTML document associated with each of the plurality of previously determined categories of information, where the HTML documents are stored in respective directories associated with each of the plurality of categories of information. Additionally, one or more keywords associated with each respective category of information are stored in the HTML header of the respective HTML document. A search engine using at least one of the plurality of searches and at least one assigned keyword may then search the HTML document. Thus, Hennings does not teach creating at least one HTML document to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword.

The Examiner further relied upon Hennings to teach creating a hypertext reference for providing the search engine with the at least one of the plurality of searches, the hypertext reference including an assigned keyword, wherein the hypertext reference directs the search engine to search a respective directory. The Examiner cited passages at paragraphs 33 and 36, and FIGs. 7-9 of Hennings in support of the rejection.

Applicants respectfully submit that the passage cited at paragraph 33 merely teaches communication between the Web server and the Web browser employing the HTTP protocol. Further, the passages cited at paragraph 36 describe features generally associated with hyperlinks.

On the contrary, claim 15 involves a hypertext reference calling the search engine is specifically created. The hypertext reference includes the keyword or keywords to be searched. In addition, the hypertext reference also includes the directory or directories

that contain the category, group or sub-group of information. However, Hennings does not teach creating a hypertext reference where the hypertext reference includes at least one assigned keyword.

In addition, the Examiner acknowledged that Hennings does not explicitly teach deciding on a plurality of categories of information to be displayed on a web site, and setting up a plurality of directories, wherein each respective one of plurality of directories corresponds to a respective one of a plurality of categories of information, each of the plurality of directories containing at least one searchable HTML document.

Rather, the Examiner argued that Morgenthaler teaches a tree directory where each category is a directory or subdirectory containing the web site or web page and pertinent information. The Examiner cited the passages at paragraphs 9, 101, and 162, and FIGs. 6 and 20 of Morgenthaler in support of the rejection. Additionally, the Examiner argued that Morgenthaler teaches search engines that retrieve web sites and web pages matching the text or topic query or keyword and display the results to the Internet user. The Examiner cited the passages at paragraphs 10 and 11 of Morgenthaler in support of the rejection.

As previously noted with reference to independent claim 1, Applicants reiterate that Morgenthaler only teaches a streamlined method of searching and pinpointing information available on the Internet. Further, in Morgenthaler, static screen shot images of the web site home pages are captured, converted into compressible files and into different sizes, constructed and categorized into a relational database, and then displayed into various sizes. Hence, Applicants submit that Morgenthaler teaches a searchable graphical database of static homepages, and displaying the search resulting in an easily navigable graphical format.

On the contrary, claim 15 relates to determining the categories of information to be displayed to the web site reader. In addition, the major groups and sub-groups of categories representative of subsets of information to be displayed to the web site reader are also determined. Further, a plurality of the directories are set up, where each of the plurality of directories is associated with a respective category group and sub-group, and where each of the plurality of directories includes at least one searchable HTML document. Applicants respectfully submit that Hennings does not teach deciding on a plurality of categories of information to be displayed on a web site, and setting up a plurality of directories, wherein each respective one of plurality of directories corresponds to a respective one of the plurality of categories of information, each of the plurality of directories containing at least one searchable HTML document.

For at least the reasons summarized hereinabove, Applicants respectfully submit that a *prima facie* case of obviousness has not been established against claim 15 and claims depending therefrom, and respectfully request the Examiner to reconsider rejection of the claims.

## Claim 22.

The Examiner relied upon Hennings for teaching determining searches corresponding to the category of information, the search being executed by a search engine. Furthermore, the Examiner argued that Hennings teaches assigning a keyword for the category of information. Additionally, the Examiner relied upon Hennings for teaching creating at least one HTML document to be searched by the search engine using at least one of the plurality of searches and at least one assigned keyword, wherein the at least one assigned keyword is included in a HTML header of the at least one HTML document. The Examiner also argued that Hennings teaches creating a hypertext reference for providing the search engine with the at least one of the plurality of searches, the hypertext reference including an assigned keyword, wherein the hypertext reference directs the search engine to search a respective directory.

Further, the Examiner acknowledged that Hennings does not explicitly teach deciding on a category of information to be displayed on a web site, and set up a category that corresponds to the category of information, the directory containing at least one searchable HTML document. The Examiner argued that Morgenthaler teaches a tree directory where each category is a directory or subdirectory containing the web site or web page and pertinent information. The Examiner cited the passages at paragraphs 9, 101, and 162, and FIGs. 6 and 20 of Morgenthaler in support of the rejection. Additionally, the Examiner argued that Morgenthaler teaches search engines that retrieve web sites and web pages matching the text or topic query or keyword, and display the results to the Internet user.

As discussed for claim 15, the Examiner thus relied upon Hennings and Morgenthaler for teaching a method for maintaining a web site via searching. However, Applicants respectfully submit that Hennings and Morgenthaler do not teach, nor does the Examiner argue that Hennings and Morgenthaler specifically teach deciding on a category of information to be displayed on a website, determining a search corresponding to the category of information, the search being executed by a search engine, assigning a keyword for the category of information, and setting up a category that corresponds to the category of information, the directory containing at least one searchable HTML document. Absent such teachings, Hennings and Morgenthaler cannot support a *prima facie* case of obviousness against independent claim 22. Its reconsideration and allowance are requested.

## Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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